

U.S. COURT OF MASSACHUSETTS

SPRINGFIELD, MASSACHUSETTS

PAVELCSYK

VS.

WILLIAMSBURG BOARD OF HEALTHH

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)  
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DOCKET NO. 03-30312-MAP

FEBRUARY 18, 2004

MOTION TO APPOINT COUNSEL

1. The court complaint was entered and date-stamped within the three-year filing deadline of the date of the infraction of entering the illegally obtained material AND way in advance of a deadline for the actual demolition date of 5/28/02--said demolition was based upon origins in the original infraction, therefore there is no argument re dates. *Defendant ignores the Court's discretion/power in setting the summons date -*

2. Proof that an appeal had been filed is attached--a meeting with Selectmen 3 days before the demolition should have clarified there was not only an appeal in process but also that the ~~Defendant~~ *Defendant* was confused about building codes. Note that the town's original attorney, Mary Giorgio of Boston, facilitated through the Selectmen the granting of a permit for a new trailer, once proof of a working septic tank had been entered in the ZBA process, in clear refutation of a reason BOH had given for demolition--police harassment had prevented the continuation of my showing D. Gibson and I. Gabrielson proof that their building code statements were

page 2

in question. A photo of a stop work order by the building inspector can be submitted for evidence, Some legal advice 3 years ago had enlightened me of the authority *the* building inspector had over the judge. In addition, I had contacted the local D.A. to investigate the authenticity of the

court edict the *Defendant* mentioned, since it was not signed by the judge and its date was at a time she had been previously transferred to an *other Cty.* court. The investigation was contingent upon a written complaint by me, which, due to illness, has been delayed and will be forthcoming.

3. *Defendant* had violated state sanitation codes by shutting off my power *in* a paroxysm of paranoia, interrupting my yearly spring cleaning and facilitating distorted and ~~damag~~ing publicity. *Their photos will reveal this interruption*

4. Attachment of correspondence between myself and Sen. Olver's Office provides some clarification, but actual litigation or settlements are hereby reserved for an attorney if this request is granted.

Respectfully submitted,

*Paula J Pavelcsyk*  
Paula J. Pavelcsyk

A TRUE COPY  
ATTEST

*Harry Jekanowski, Jr.*

Commonwealth of Massachusetts  
County of Hampshire  
The Superior Court  
Hampshire Superior Court  
15 Gothic Street  
P O Box 1119  
Northampton, MA 01060

00 240

CIVIL DOCKET# HSCV2000-00240

RE: Town of Williamsburg by its Board of Health v Pavelczyk

**NOTICE**  
**(SPECIAL CALL OF THE DOCKET)**

You are hereby notified of a special call of the docket:

The court has ordered a status review of the appeal filed in the above entitled action.

Please indicate the status of this appeal in the space below, and forward to this office by **04/25/2003**.  
*I wish to activate this appeal. Some attorneys are interested in this case. There were two major flaws in the judge's order that was being appealed, so I will select one attorney to pursue the*  
Failure of the Appellant to notify the Clerk's office by **04/25/2003**, will result in the dismissal of the appeal.

*Thank you*

Dated at Northampton, Massachusetts this 26th day of March, 2003.

*Harry Jekanowski, Jr.*

Harry Jekanowski, Jr.,  
Clerk of the Courts

*Signed: Paula J. Pavelczyk*

XC: Paula Pavelczyk @ 27 North Farms Rd., Williamsburg, MA 01096  
Edward M. Reilly, Esquire & Mary Giorgio, Esquire

(Typed to follow)

3-21-03

To: Kristen Wood

Economic Development Specialist  
Sen. Oliver's Office

From: Paula Pavelcsyk (413-585-8269)

I promised you a written complaint regarding a zoning issue with the Town of Williamsburg. My mailing address is P.O. Box 435 Haydenville, MA 01039. ZBA meets 3/31/03. On 5/28/02 my mobilehome was demolished without the building inspector giving a demo order - building code violations had been met but no inspection was made since 9/19/01 and the town proceeded with the demolition before I could extract valuables. I was pulled off my property in violation of civil rights.

2. Hilltown Development Corp. can provide 19 G for a replacement mobilehome, provided they have a permit from the town. Septic, water, drainage, lot, etc. met approval for a building permit application.
3. The building inspector did not wish to deny/grant a permit and kicked it over to Zoning Board of Appeals before a permit application had even been filed.
4. Atty Tim Washburn found laws attesting to my right to have a mobilehome on my lot. Two zoning board members, Mr. Mann & Mrs. Berkman did not heed the statement of law.

\* a few leaning cinder piers supporting the former home were reinforced by additional columns, in spite of scientific evidence that the bldg. would not topple even in the closest of the reinforcements.

JOHN W. OLVER  
U.S. HOUSE OF REPRESENTATIVES

COMMITTEE  
APPROPRIATIONS

COMMITTEES  
TRANSPORTATION AND TREASURY  
RANKING MEMBER  
INTERIOR

ASSISTANT WHIP

Congress of the United States  
House of Representatives  
Washington, DC 20515-2101

March 31, 2003

Ms. Paula Paelecsyk  
P.O. Box 435  
Haydenville, MA 01039

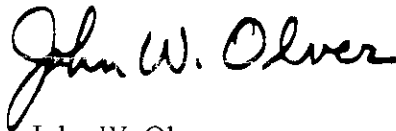
Dear Ms. Paelecsyk,

Thank you for contacting my office for assistance with the Zoning Board of Appeals of Williamsburg.

I have spoken to the Chairman of the Board, David Mathers, and asked them to give full and fair consideration to your situation. Unfortunately, my jurisdiction as a federal official does not allow me to influence local issues beyond this request.

If a federal aspect comes into the picture, please contact my aide, Elaine Pluta, at my Holyoke District Office.

Sincerely,



John W. Olver  
Member of Congress

JWO/ep

Delays in the permit were the result of confusion and misunderstandings BOH had caused -- Dave Mathers knew better than to even read BOH records - the 2 other ZBA members required the outside intervention above -  
'Update': ACDC funding may not be available.

Permit was granted 5/4/03 and is valid til 5/4/05. /PP

PLEASE RESPOND TO:

1027 LONGWORTH HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515-2101  
1202/225-5335  
1202/226-1224 FAX

DISTRICT OFFICE  
57 Suffolk Street  
Suite 210  
Holyoke, MA 01031  
413/532-7010  
413/532-6843 FAX

CONGRESSIONAL BUILDING  
78 CENTER STREET  
PITTSBURGH, MA 01201  
413/442-6946  
413/443-0709 FAX

463 Main Street  
Holyoke, MA 01040  
978/342-8722  
978/342-8166 FAX